IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN, DEONTAE TATE, JEREMY S. MELTON, ISSACCA POWELL, KEITH BURGESS, TRAVIS BOYD, TERRENCE DRAIN, and KIMBERLY ALLEN on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

BILL OLDHAM; FLOYD BONNER, JR.; ROBERT MOORE; KIRK FIELDS; CHARLENE MCGHEE; REGINALD HUBBARD; DEBRA HAMMONS; TIFFANY WARD; SHELBY COUNTY, TENNESSEE; TYLER TECHNOLOGIES, INC.; GLOBAL TEL*LINK CORPORATION; SOFTWARE AG USA, INC.; SIERRA-CEDAR, INC.; SIERRA SYSTEMS GROUP, INC.; and TETRUS CORP.,

Defendants.

Civil Action No. 2:16-cv-02907-SHM-tmp

(Hon. Judge Samuel H. Mays)

SECOND REVISED NOTICE TO TAKE THE DEPOSITION OF BILL OLDHAM

To: Bill Oldham

c/o Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000

Email: rcraddock@wyattfirm.com Email: ohorton@wyattfirm.com

-and-

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street

Suite 950

Memphis, TN 38103 (901) 222-2100

Email: lee.whitwell@shelbycountytn.gov

Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure,

Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell,

Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Bill

Oldham at the law offices of BAKER DONELSON BEARMAN CALDWELL & BERKOWITZ, P.C., 165

Madison Avenue, Suite 2000, Memphis Tennessee 38103, commencing on May 8, 2020 at 9:30

a.m., Central Standard Time, and continuing thereafter from hour to hour and day to day until

complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as

evidence, preservation of testimony, and all other purposes authorized by law and will be

recorded by a certified court reporter, who will record the deposition by means of stenograph

and/or audio recordings. The deposition may also be recorded by video or other visual and

electronic means.

Respectfully submitted,

s/ William E. Routt

Frank L. Watson, III (Tenn. Bar No. 15073)

William F. Burns (Tenn. Bar No. 17908)

William E. Routt (Tenn. Bar. No. 28577)

WATSON BURNS, PLLC

253 Adams Avenue

Memphis, TN 38103

Phone: (901) 529-7996

Fax: (901) 529-7998

Email: fwatson@watsonburns.com

Email: bburns@watsonburns.com

Email: wroutt@watsonburns.com

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Michael G. McLaren (Tenn. Bar No. 5100) William E. Cochran, Jr. (Tenn. Bar No. 21428) Brice M. Timmons (Tenn. Bar No. 29582) BLACK MCLAREN JONES RYLAND & GRIFFEE PC 530 Oak Court Drive Suite 360 Memphis, Tennessee 38117 Phone: (901) 762-0535

Fax: (901) 762-0539 mmclaren@blackmclaw.com wcochran@blackmclaw.com

btimmons@blackmclaw.com

Joseph S. Ozment (Tenn. Bar No. 15601)

THE LAW OFFICE OF JOSEPH S. OZMENT, PLLC

1448 Madison Ave.
Memphis, Tennessee 38104
Phone: (901) 525-4357
Email: jozment@oz-law.net

Claiborne H. Ferguson, Esq. (Tenn. Bar. No. 20457)
THE CLAIBORNE FERGUSON LAW FIRM, P.A. 294 Washington Ave.
Memphis, TN 38103

(901) 529-6400

Email: claiborne101@yahoo.com

Counsel for Plaintiffs and the putative Class Members

CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of March, 2020, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

Robert E. Craddock, Esq.
Odell Horton, Jr., Esq.
WYATT, TARRANT & COMBS, LLP
1715 Aaron Brenner Drive, Suite 800
Memphis, Tennessee 38120
(901) 537-1000

Email: rcraddock@wyattfirm.com Email: ohorton@wyattfirm.com

Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee

Bradley E. Trammell, Esq.
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
(901) 577-2121

Email: btrammell@bakerdonelson.com

Counsel for Defendant Tyler Technologies, Inc.

Douglas F. Halijan, Esq. William David Irvine, Esq. BURCH PORTER & JOHNSON 130 N. Court Avenue Memphis, TN 38103-2217 (901) 524-5000

Email: dhalijan@bpjlaw.com Email: wirvine@bpjlaw.com

Counsel for Defendant Software AG USA, Inc.

Emmett Lee Whitwell, Esq.
SHELBY COUNTY ATTORNEY'S OFFICE
160 N. Main Street
Suite 950
Memphis, TN 38103
(901) 222-2100
Email: lee.whitwell@shelbycountytn.gov

Counsel for Defendants Bill Oldham, Floyd Bonner, Jr., Robert Moore, Kirk Fields, Charlene McGhee, Reginald Hubbard, Debra Hammons, Tiffany Ward, and Shelby County, Tennessee

Beth Bivans Petronio, Esq. K&L GATES, LLP 1717 Main Street Suite 2800 Dallas, Texas 75201 (214) 939-5815 Email:beth.petronio@klgates.com

Counsel for Defendant Tyler Technologies, Inc.

Russell Brandon Bundren, Esq.
James L. Murphy, Esq.
BRADLEY ARANT BOULT CUMMINGS LLP
1600 Division Street, Suite 700
Nashville, TN 37203
(615) 252-4647
Email: bbundren@babc.com
Email: jmurphy@bradley.com

Counsel for Defendant Global TelLink Corporation Albert G. McLean, Esq. Kevin David Bernstein, Esq. SPICER RUDSTROM PLLC 119 S. Main Street, Suite 700 Memphis, TN 38103 901-522-2324

Email: amclean@spicerfirm.com Email: kdb@spicerfirm.com

Counsel for Defendant Sierra-Cedar, Inc.

Robert A. McLean, Esq. Garrett M. Estep, Esq. FARRIS BOBANGO BRANAN, PLC 999 S. Shady Grove Road, Suite 500 Memphis, Tennessee 38120 Email: rmclean@farris-law.com Email: gestep@farris-law.com

Counsel for Defendant Tetrus Corp.

Heather Marie Gwinn Pabon, Esq. GORDON & REES SCULLY MANSUKHANI, 3401 Mallory Lane Suite 120 Franklin, TN 37067 (615) 722-9010 Email: hgwinn@grsm.com

Counsel for Defendant Sierra Systems Group, Inc.

s/ William E. Routt

William E. Routt